

US DISTRICT COURT FOR MASSACHUSETTS

Dr. SHIVA AYYADURAI,)
Plaintiff,)
)
v.)
)
WILLIAM F. GALVIN,)
in his official capacity as)
Secretary of State,)
CHARLES D. BAKER)
in his official capacity as)
Governor of Massachusetts,)
Defendants.)

Case No. 1:20-CV-12080-MLW

MOTION FOR A PRELIMINARY INJUNCTION
ORDERING DECERTIFICATION OF THE 2020 U.S. SENATE RACE

In the accompanying memorandum of law and affidavit, Plaintiff provides the evidentiary basis for this extraordinary relief. Decertification of the 2020 U.S. Senate race is required by the constitution due to debasement of the weight of votes cast for the Plaintiff and by the binding precedent set in the 1st Circuit by *Griffin v. Burns*, 570 F.2d 1065 (1st Cir. 1978).

Plaintiff respectfully requests that this court speedily order Governor Baker to decertify the result of the 2020 U.S. Senate race, and order a court-supervised hand count of the paper ballots cast for the 2020 Republican primary race. If, as expected, the paper count differs vastly from the electronic count declared by Galvin, a fresh special election for U.S. Senate is required by *Griffin*.

Respectfully submitted under the pains and penalties of perjury,

/s/ Dr. Shiva Ayyadurai

December 25, 2020

Dr. Shiva Ayyadurai
Plaintiff, *pro se*
701 Concord Avenue
Cambridge, MA 02138
Phone: 617-631-6874
Email: vashiva@vashiva.com

CERTIFICATE OF SERVICE

Plaintiff certifies that he served this motion upon Defendant Galvin via counsel Adam Hornstine via ECF, and will serve upon Defendant Baker via the Sheriff.

Respectfully submitted under the pains and penalties of perjury,

/s/ Dr. Shiva Ayyadurai

Date: December 25, 2020

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CERTIFICATE OF CONFERRAL PER L.R. 7.1

Plaintiff certifies that he conferred with counsel Adam Hornstine regarding this motion for decertification and was informed that Defendant Galvin opposes a court-supervised hand count of paper ballots.

Respectfully submitted under the pains and penalties of perjury,

/s/ Dr. Shiva Ayyadurai

Date: December 25, 2020

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